



RE: LLBG Permit   
Dave Bartus to: Conaway, Kathy (ECY)

01/06/2010 12:28 PM

Kathy: In a spat of indifferent avoidance behavior (I'm supposed to be preparing comments on the NRDWL/SWL "unclosure" plan), I spent a few minutes further looking over the LLBG Addendum B, looking at a few sections toward the end. Markup attached.



LLBG Addendum B 2.doc

From this additional work, I draw or reinforce two main thoughts. First, this WAP isn't anywhere close to being acceptable, and it requires very substantial re-work and re-writing. I simply can't understand what Ecology has been doing over the past five years on this.

Second, it is clear to me that whomever has been working on the WAP has been doing so in complete isolation from what dangerous waste management units are within the LLBG-1 operating unit group, and what the capabilities and functions of these waste management units are. From my perspective, it is simply not possible to successfully develop, review, or edit Addendum B except in close and parallel integration with consideration of Addendum C.

One other item I'm expecting will need attention and effort. I'm pretty sure that the Trench 31/34 closure plan will, at best, be a broad conceptual proposal, not a fully-developed cover design, including full engineering, construction, construction QA/QC and other requirements. This will certainly require facility input, and the earlier Ecology can clearly and effectively communicate its expectations to the facility, the sooner an acceptable document will be available for Ecology consideration. From an EPA perspective, having an adequate groundwater monitoring program, as well as a complete cover design and closure plan, for these two active landfills are at the very top of the priority list.

I've included a clarifying note in the text of your e-mail below.

"Conaway, Kathy (ECY)"

Thank you for sending this Lee and askin...

01/05/2010 05:41:21 PM

From: "Conaway, Kathy (ECY)" <KCON461@ECY.WA.GOV>  
To: "Fearon, Lee (ECY)" <LFEA461@ECY.WA.GOV>  
Cc: "Singleton, Deborah (ECY)" <dsin461@ECY.WA.GOV>  
Date: 01/05/2010 05:41 PM  
Subject: RE: LLBG Permit

Thank you for sending this Lee and asking for guidance and help. As the permit writer, here is a list of items you can help provide and complete in moving this WAP to final draft.

- Compare the LLGB WAP to the 222-S WAP and WRAP WAP, **specifically the EPA comments** in those WAPs. The majority of issues identified in these WAPs will need addressed in the LLBG WAP. Deborah can provide to you the WAP/Comments versions.
- LLGB WAP **must demonstrate compliance with the LDR treatment standards**. One significant difference in Trench 31/34 is it will be one of the few WAPs (if not the only one) that will routinely be applied to demonstrating compliance with LDR treatment stds, both method of treatment and concentration based treatment stds. This WAP is deficient as it does not show the sampling for demonstrating compliance as described above.



- LLGB WAP has some policy concerns. Trench 31/34 does not store waste. It only disposes of waste. Is there plans for a container storage unit? I thought that Ecology had decided to segregate Trench 31/34 and 94 from all of the unlined trenches. Where is that in this WAP? Actually, there are two container storage units, one each at Trench 31 and 34, used to stage wastes prior to disposal. Although there is no permit authorization for these container storage units, there is a legitimate need for them, and they should have explicit permit authorization (reflecting full compliance with WAC 173-303 standards, of course).
- Waste Acceptance needs to be clearly defined and explained.

This bullet list is a good starting point on shaping this WAP up and making it acceptable and enforceable. Your help will be valuable if you can work on these items.

**From:** Fearon, Lee (ECY)  
**Sent:** Tuesday, January 05, 2010 1:44 PM  
**To:** Conaway, Kathy (ECY)  
**Cc:** Singleton, Deborah (ECY); Mandis, Michelle (ECY)  
**Subject:** LLBG Permit

Kathy: Michelle and I are working together on the LLBG permit. I have edited the Draft from 2004 that Deborah wrote. I have attached the edited version. Would you please look over this Draft and guide us in the protocols of how to proceed in the process? Thank you for your help and kind consideration.

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